## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

THE STATE OF TEXAS and

THE STATE OF MISSOURI,

Plaintiffs,

Plaintiffs,

V.

Solution

## APPENDIX IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Exh	Exhibit		Description	Page(s)
A	A		aration of Wyatt Suling	App.001–007
	A-1 A-2		Assessment of the Migrant Protection Protocols (MPP)	App.008–018
			Department of Homeland Security's Press Release dated December 20, 2018	App.019–022
	A-3		Memorandum of Secretary Kirstjen M. Nielsen dated January 25, 2019	App.023-027
	A-4		MPP Guiding Principles	App.028–030
	A	5	Memorandum of Acting Secretary David Pekoske dated January 20, 2021	App.031–032
	A-6		Department of Homeland Security's Press Release dated March 16, 2021	App.033-039
	A-7		Fox News Article dated March 31, 2021: "Border Patrol official expects more than 1 million migrant encounters this year"	App.040-055

A-8	U.S. Customs and Border Protection Encounters: Southwest Land Border Encounters for Fiscal Year 2021	App.056–078
A-9	Associated Press Article dated April 1, 2021: "Migrants freed without court notice – sometimes no paperwork"	App.079–092
A-10	NPR Article dated March 23, 2021: "Ex-DHS Chief Says Biden Was Warned About Dismantling Trump's Border Policies"	App.093–102
A-11	New York Times Article dated April 1, 2021: "The Real Reason for the Border Crisis"	App.103–110
A-12	New York Times Article dated March 3, 2019: "You Have to Pay With Your Body"	App.111–116
A-13	Human Trafficking by the Numbers: The Initial Benchmark of Prevalence and Economic Impact for Texas	App.117–227
A-14	Migrant Protection Protocols Update	App.228–237
A-15	Polaris Project's publication:, "The Latino Face of Human Trafficking and Exploitation in the United States"	App.238–248
A-16	83 Fed. Reg. 55,934-55,935 (Nov. 9, 2018)	App.249–269
A-17	Executive Office for Immigration Review Adjudication Statistics: Credible Fear and Asylum Process: Fiscal Year (FY) 2008 – FY 2019	App.270–271
A-18	Transactional Access Records Clearinghouse (TRAC) Immigration: Immigration Court Backlog Tool	App.272–273
A-19	Missouri Department of Elementary and Secondary Education: State Report Card – 2020 Data	App.274–275
A-20	Migration Policy Institute, Profile of the Unauthorized Population: Missouri	App.276–282
A-21	Pew Research Center: U.S. unauthorized immigrant population estimates by state, 2016	App.283–287
A-22	Transactional Access Records Clearinghouse (TRAC) publication: Now Over 8,000 MPP Cases Transferred Into United States Under Biden	App.288–296

В		Decla	aration of Ryan D. Walters	App.297–299
	B-1		U.S. Dept. of Homeland Security Migrant Protection Protocols Website	App.300–305
	B-2 B-3		Assessment of the Migrant Protection Protocols (Oct. 28, 2019)	App.306–316
			Memorandum of Understanding Between Texas and DHS	App.317–326
	B-4		U.S. Customs and Border Protection Custody and Transfer Statistics FY2021	App.327–333
	В		U.S. Citizenship and Immigration Services Description of Parole	App.334–345
	В	-6	2.2.2021 DHS letter to Texas	App.346–348
	B-7		DPS Texas Criminal Illegal Alien Data	App.349–357
	B-8		U.S. Census Bureau Table – Geographic Mobility by Citizenship Status	App.358–370
	В	-9	Foreign-Born Population in Texas	App.371–386
	В-	-10	Gone to Texas	App.387–388
C		Declaration of Mark Morgan		App.389–400
D	١	Decla	aration of Alison Phillips	App.401–413
Е		Declaration of Cara Pierce		App.414–423
F	F		aration of Sheri Gipson	App.424–429
	F	-1	Verifying Lawful Presence	App.430–437
G		Declaration of Leonardo R. Lopez		App.438–442
	G-1		U.S. Health and Human Services Office of Refugee Resettlement	App.443–447
Н	Н		aration of Lisa Kalakanis	App.448–453
	Н	-1	Estimating the Percent of Undocumented Clients	App.454–457
I	Ι		aration of Rebecca Waltz	App.458–461

J	J	Seco	nd Declaration of Ryan D. Walters	App.462-464
	J	-1	Memorandum of Secretary Alejandro N. Mayorkas dated June 1, 2021	App.465-472

Date: June 8, 2021

ERIC S. SCHMITT

Attorney General of Missouri

/s/ *D. John Sauer* 

D. JOHN SAUER, #58720MO\*

Solicitor General

JESUS A. OSETE, #69267MO\*

Deputy Solicitor General

OFFICE OF THE ATTORNEY GENERAL

Supreme Court Building 207 West High Street

P.O. Box 899

Jefferson City, Missouri 65102

Tel. (573) 751-8870

Fax (573) 751-0774

John.Sauer@ago.mo.gov

Counsel for Plaintiff State of Missouri

Respectfully submitted.

KEN PAXTON

Attorney General of Texas

Brent Webster

First Assistant Attorney General

JUDD E. STONE II

Solicitor General

Texas Bar No. 24076720

PATRICK K. SWEETEN

Deputy Attorney General for Special Litigation

Texas Bar No. 00798537

/s/ William T. Thompson

WILLIAM T. THOMPSON

Deputy Chief, Special Litigation Unit

Attorney-in-Charge

Texas Bar No. 24088531

RYAN D. WALTERS

Special Counsel

Texas Bar No. 24105085

OFFICE OF THE ATTORNEY GENERAL

SPECIAL LITIGATION UNIT

P.O. Box 12548 (MC-009)

Austin, Texas 78711-2548

Tel.: (512) 463-2100

Fax: (512) 457-4410

patrick.sweeten@oag.texas.gov will.thompson@oag.texas.gov

ryan.walters@oag.texas.gov

Counsel for Plaintiff State of Texas

<sup>\*</sup>Admitted pro hac vice

## CERTIFICATE OF SERVICE

I certify that on June 8, 2021, a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) and served on all counsel of record.

/s/ William T. Thompson
William T. Thompson